

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Friday, July 10, 2009

From: Alyssa Hughes

Subject: Initial POLREP

Allied Universal NaOH Spill
1405 Possum Hallow Road, Ranger, GA
Latitude: 34.4830500
Longitude: -84.7333200

POLREP No.:	1	Site #:
Reporting Period:		D.O. #:
Start Date:	7/9/2009	Response Authority:
Mob Date:	7/9/2009	Response Type:
Demob Date:	7/9/2009	NPL Status:
Completion Date:	7/9/2009	Incident Category:
CERCLIS ID #:		Contract #
RCRIS ID #:		

Site Description

At approximately 2200 on 8 July 2009 night shift personnel at the Allied Universal Corporation observed a release of 50% sodium hydroxide from a railcar during unloading operations. NRC Report # 911022 was made at 2220. The report stated that the release occurred along the rail spur inside the facility. At the time of the report the quantity of material released was unknown.

On 9 July 2009 Duty Officer Ben Franco contacted the responsible party to ascertain the details of the incident. At this time he was informed that the spill quantity was estimated to be 10,000 gallons and that Georgia Environmental Protection Division representative Scott Coburn was on-site and had been since approximately 0200. Based on the amount of the spill, Duty Officer dispatched R1 OSC Hughes and responder in training Matt Huyser.

Current Activities

OSCs Hughes and Huyser arrived on-site at approximately 1145 and met with Ga EPD representative Scott Coburn who had been conducting oversight of the clean-up since approximately 0200. Facility branch manager Jim Novak briefed the group on the timeline of events and answered any questions prior to providing a tour of current clean-up operations.

The plant operation consists of pumping 50% sodium hydroxide from a railcar using 45 pounds of air pressure, mixing the product with water to create 18% sodium hydroxide solution, and then pumping it into above ground storage tanks.

At approximately 2100 on July 8, the night manager noticed that the level of one of the tanks was not increasing despite the fact that unloading operations were taking place at the rail car. He began to go through procedures to try to identify the source of the problem. Approximately 1 hour later he went to visually inspect the railcar and observed a pool of product. At this time he notified his manager, who reported the incident to the NRC. At approximately 2230 Gordon County EMA director and local fire department arrived on-scene. At 2300 Marion Environmental, hired by the RP, arrived on-site. The environmental contractor walked the site, assessed the situation, and developed a plan of action. The EMA director and FD were satisfied with the actions to mitigate the clean-up and left the site around midnight. At 200 am Ga EPD representative Scott Coburn arrived on-site to oversee the clean-up activities.

It was discovered that a hose leading from the railcar to the shed where mixing occurs, failed. The body of the hose separated from the coupling without disconnecting any of the male/female parts. Once the hose was disconnected product sprayed on both sides of the tracks. It is estimated that the 2" hose with 45 pounds of pressure would release the 10,000 gallons remaining in the railcar in approximately 50 minutes.

Marion Environmental established 3 collection points. There is a ditch lined with visqueen that runs along

the south side of the railway spur. This ditch was established during the remediation from a previous spill in 2007. The ditch captured much of the product that was released from the railcar. Marion Environmental built a dam down the drainage ditch at the location where no additional product was observed. Approximately 5,500 gallons of product were pumped out of this ditch and into a frac tank. A second location on the north side of the tracks was established. Approximately 2,000 gallons of product was pumped into a second frac tank. The drainage pathway was then excavated down to 1' depth. Marion Environmental will utilize a pH probe to indicate when excavation is complete. Any pH between 6 and 9 will be acceptable. Additional product traveled along the drainage ditch on the south side of the spur line and deposited into a pond. Product is currently being pumped out of this pond. The pond area is approximately 2500 square feet by a 3 foot depth, estimated to contain approximately 3,900 gallons. All of this material will be removed.

The railcars were pressure washed and are expected to be moved during the morning of July 10.

Planned Removal Actions

Excavation and pumping will continue. All material will be sampled prior to disposal. Appropriate disposal facilities will be selected.

This POLREP will be amended when the final quantities of material are known and disposal facilities are selected.

response.epa.gov/AlliedUniversalCorpNaOHSpill